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4 Attorney for Defendant Felipe Jasso-Rios

5
6 IN THE UNITED STATES DISTRICT COURT
7 FOR THE SOUTHERN DISTRICT OF CALIFORNIA
8 (HON. ROGER T. BENITEZ.)

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 FELIPE JASSO-RIOS,

13 Defendant.

) Case No. 08-CR-0159-BEN
)
) NOTICE OF MOTION AND
) MOTION FOR
) 1) DISCOVERY/PRESERVE EVIDENCE
) 2) LEAVE TO FILE MOTIONS
)
) Date: 3/2/08
) Time: 1:30 p.m.
) Judge: Hon. Roger T. Benitez

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16 TO: THE UNITED STATES ATTORNEY and STEVEN DE SALVO, ASSISTANT UNITED
17 STATES ATTORNEY:

18 PLEASE TAKE NOTICE that on March 3, 2008 at 1:30 p.m., or as soon thereafter as
19 counsel may be heard, before the Honorable Roger T. Benitez, United States District Court for the
20 Southern District of California, the Defendant, Felipe Jasso-Rios, by and through his counsel, James
21 Matthew Brown, will ask this Court to enter an Order granting the following motions: 1) to compel
22 and preserve discovery; and 2) Leave to file additional motions.

23 MOTION

24 The defendant Felipe Jasso-Rios, by and through his counsel, James Matthew Brown,
25 pursuant to United States Constitution, Fed. R. Crim. Proc., Rules 8 and 14, and applicable case law
26 and local rules, moves this Court for an Order: 1) to compel and preserve discovery; and 2) Leave
27 to file additional motions.
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1 These motions are based upon the instant Motions and Notice of Motions, the attached
2 Statements of Facts and Memorandum of Points and Authorities, the files and records in the above-
3 captioned matter, and any and all other materials which may be brought to this Court's attention
4 prior to or during the hearing on these motions.

5 Respectfully Submitted this 28 day of February 2008.

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8 S/James Matthew Brown
9 James Matthew Brown
10 Attorney of Defendant,
11 Felipe Jasso-Rios
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